

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.: 21-cr-108 (PAM/TNL) (3)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	DEFENDANT’S <u>AMENDED</u> MEET AND
)	CONFER NOTICE
J ALEXANDER KUENG,)	
)	
Defendant.)	
)	
)	

Thomas C. Plunkett, as counsel of record for defendant, J ALEXANDER KUENG, hereby certifies that, as required by Local Rule of the United States District Court for the District of Minnesota 12.1(b), he has conferred with opposing counsel, The Assistant United States Attorney on August 2, 2017, regarding defendant’s pretrial motions. As a result of this discussion, the issues were clarified and narrowed.

There are NO issues that remain to be resolved that require an evidentiary hearing. There are issues that remain to be resolved that DO NOT require an evidentiary hearing. Those issues are limited to time frames for disclosure of information, severance of Mr. Chauvin from Mr. Kueng’s case and striking paragraph 3 from the indictment as surplusage.

As to timing of disclosure the Government agrees to abide by any order the Court may issue. As to severance the Government opposes the motion for severance, but the parties agree that despite this opposition, a decision on severance is premature and the parties jointly asks that this motion be reserved until a point in the future when information relevant to severance of Mr. Chauvin becomes more developed. As to striking surplusage, the Government opposes.

The Government has also agreed to continue to provide all information as it becomes available and to comply with any pre-trial order of the court regarding disclosure of impeachment, Jencks and other trial information.

Respectfully submitted,

Dated: August 4, 2021

/s/ Thomas C. Plunkett

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